

Linda M. Tirelli, Esq.  
Tirelli Law Group, LLC  
50 Main Street, Suite 1265  
White Plains, NY 10606  
ltirelli@tw-lawgroup.com

Hearing Date: May 21, 2019  
Hearing Time: 10:00 a.m.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK  
WHITE PLAINS DIVISION

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Case No. 18-23537(RDD)  
(18-23538)

IN RE: Sears Holding Corp

Martha G. West

Movant

v.

Sears, Roebuck and Co.

Respondant

**NOTICE OF MOTION**

**Chapter 13**

Debtor.

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**S I R S :**

**PLEASE TAKE NOTICE** that upon the Motion for Relief from the Automatic Stay and Abandonment along with proposed Order, the undersigned will move this Court before the Honorable Robert D. Drain United States Bankruptcy Judge, Southern District of New York on May 21, 2019 at 10:00 AM, or as soon thereafter as counsel can be heard, at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, NY 10601, for an Order granting relief from the automatic stay pursuant to section 362(d) of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief requested in the Motion must be made in writing, filed with the Court electronically in accordance with General Order M-399 by registered users of the Court's electronic case filing system and, by all other parties interest, mailed to the Clerk of the United States Bankruptcy Court, 300 Quarropas Street White Plains, NY 10601-4140, on a compact disc, in text-searchable portable document format (PDF) (with two hard copies delivered directly to the Chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, 300 Quarropas Street, White Plains, NY 10601-4140) and served in accordance with General Order M-399 or other form upon: (i) Joel G. Hargis, Esq., 211 North 2<sup>nd</sup> Street, Rogers, AR 72756, (ii) Linda M. Tirelli, Esq., Tirelli Law Group, LLC, 50 Main Street, Suite 1265, White Plains, NY 10606, (iii) John R. Peel, Esq, Attorney for Movant, Peel Law Firm, 120 South Glenwood, Russellville, AR 72811, (iv) Office of the United States

Trustee, Attn: Paul Schwartzberg, Esq., Richard Morrissey, Esq., 201 Varick Street, Suite 1006,  
New York, NY 10014, so as to be actually received no later than May 14, 2019..

**Dated:** White Plains, New York  
March 29, 2019

Law Offices of Tirelli Law Group, LLC

By: /s/ Linda M. Tirelli  
Linda M. Tirelli, Esq  
Local Counsel for Movant  
50 Main Street, Suite 1265  
White Plains, NY 10606

By: /s/ Joel G. Hargis  
Joel G. Hargis, Esq  
Counsel for Movant  
Caddell Reynolds  
211 N. 2<sup>nd</sup> Street  
Rogers, AR 72756